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June 27, 2014

Via ECF and Facsimile (973) 645-3841

Honorable Claire C. Cecchi, U.S.D.J.
United States District Court
for the District of New Jersey
Martin Luther King Jr. Federal Building
50 Walnut Street
Newark, New Jersey 07102

Re: National Labor Relations Board and New England Health Care
Employees Union, District 1199, SEIU v. 710 Long Ridge Road
Operating Company II, LLC, *et al.*, Consolidated Civ. Action No.
14-CV-01725 (CCC)

On Appeal from Orders of the United States Bankruptcy Court Entered by the
Honorable Donald H. Steckroth, Case No. 13-13653 (DHS)

Dear Judge Cecchi:

This firm represents the appellees, 710 Long Ridge Road Operating Company II, LLC d/b/a Long Ridge of Stamford, 240 Church Street Operating Company II, LLC d/b/a Newington Health Care Center, 1 Burr Road Operating Company II, LLC d/b/a Westport Health Care Center, 245 Orange Avenue Operating Company II, LLC d/b/a West River Health Care Center and 107 Osborne Street Operating Company II, LLC d/b/a Danbury Health Care Center (the “**Appellees**”), in the above-referenced matter.

On June 30, 2014, the Appellees intend to file a reply brief (the “**Reply**”) in response to the objections [Docket Nos. 49 and 50] filed by the National Labor Relations Board (the “**NLRB**”) and the New England Health Care Employees Union, District 1199, SEIU (the “**Union**,” and together with the NLRB shall be referred to herein collectively as, the “**Appellants**”) to the Appellees’ motion to dismiss [Docket No. 19] the above-captioned appeals filed by the Appellants of seven (7) orders entered by the United States Bankruptcy Court for the District of New Jersey as equitably moot.

Cole, Schotz, Meisel, Forman & Leonard, P.A.
Attorneys at law

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Pursuant to L. Civ. R. 7.2(b), the Reply submitted under L. Civ. R. 7.1(d)(3) must be 15 pages in length, excluding pages required for the table of contents and authorities. Pursuant to L. Civ. R. 7.2(b), briefs of greater length will only be accepted if special permission of the Judge or Magistrate Judge is obtained prior to submission of the brief.

Given that the Appellees are responding to two opposition briefs, the Appellees respectfully request permission from this Court to file an 18-page oversized Reply.

Respectfully submitted,

/s/ Michael D. Sirota

Michael D. Sirota

MDS:rtj

cc: David Bass, Esq. (via email)
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Jennifer Abruzzo, Esq. (via email)

SO ORDERED

s/Claire C. Cecchi
Claire C. Cecchi, U.S.D.J.

Date:

6/30/14